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Sandra Wilder – Rhodan / Beneficiary of
Estate of George M. Rhodan

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

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2023 MAY 23 PM 2: 00

Plaintiff,

V.

State of South Carolina, Family Court Judge,
Nancy C. McLin; Attorney J. Graham Sturgis Jr.;
Atty. Veronica G. Smalls; Vera Simmons; Aness
Jenkins; Sara Rhodan; Kimberly Rhodan; Shacoga
Simmons; Dave Friedman; Keller Williams Realty;
Wells Fargo Bank; Judge Cely Brigman; Judge
Kenneth E. Fulp, Jr; Judge William J. Wylie, Jr; Atty
Eduardo Curry; Rep. Micheal Rivers; State
House #121; Ruff & Ruff, Attys at Law,

Defendants.

C/A No. 2: 23-00771 –BHH-MHC

MOTION TO AMEND SUMMONS

AND COMPLAINT:

JURY TRIAL REQUESTED

AMENDED COMPLAINT

NOW COMES THE PLAINTIFF, SANDRA WILDER-RHODAN, PRO SE' in the above and entitled matter. Plaintiff in the above named and in each and every claim hereof is complaining of the Defendants alleges and says: The parties hereof are subject matter of all the matters and things herein alleged are within the jurisdiction of this Honorable Court. Encl. Rule 8 of the Federal Rules of Civil Procedures.

This Complaint is of violation of the United States Constitution,, Title 18. U.S. Code 242, Title 18 U.S. Code 1341-Frauds and swindles; 1342; Fictitious name or address. Title 18. 1344 bank Fraud, Forgery of name to defraud bank account. Plaintiff, further contends a violation under 18 U.S. code 641, 664, Embezzlement and theft of ownership rights and the unlawful forgery and sale of personal and real property. The unlawful taking of both personal and real property, (2) vehicles, truck and new Buick car, the unlawful taking of French doors, new storm proof windows, new home fence, wheel barrel and new dog kennel, our marital

home located at 303 Elliot Drive, Ladson, SC, along with taking and sale of our property at "2" Oak Drive, Lady's Island, SC.

JURISDICTION

The Plaintiff, Sandra Wilder-Rhodan, Pro Se, is resident of North Charleston, South Carolina.

day of May 2023 of North Charleston, South Carolina lived and worked as a travel

transportation service Owner and Operator. This action arises under violation of the U.S.

Constitution, under the Fourteenth Amendment **Due Process Clause** and Equal protection

clause (Section) (1).18 U.S. Code 641, 664 theft and embezzlement from employee benefit fund

converting property of ,655 theft by bank public money, property, or records, Title 18

Deprivation of rights Code 242, Discrimination; Harassment in violation of Title VII. 1972.

Title 42 1983 provides in relevant part that: every person who, under the color of any

statute , ordinance, regulation....of any state...subjects or causes to be subjected, any citizen of

the United States or other person within the jurisdiction thereof to the deprivation of any rights,

privileges, or immunities secured by the Constitution....shall be liable to the party injured.. Title

42 1985 action which seeks compensatory and punitive damages in conjunction with relief as in

this case is considered a legal claim, entitling Plaintiff to a jury trial. As direct and approximate

result, the defendant lawyer acting in conspiracy with the state actors under the color of law

have become state actors in this case. See Dennis v. Sparks, 449 U.S. 24, 101, S. Ct. 183. See

Adickes v. S.H. Kress & Co., 389. In the above and entitled matter; Sandra Wilder- Rhodan /

Estate of George M. Rhodan. Wherein this is a conspiracy and fraud case. (1) Vera Simmons

Claims she was the husband of George M. Rhodan. (2) Vera Simmons is assigned as the

personal representative. (3) The actor's forged Vera Simmons name on the death certificate.

{2}

(4) Attorney J. Graham Sturgis, Jr. signed a stop payment order on both Sandra Wilder Rhodan- & George M. Rhodan bank accounts ad IRA accounts.(5) Attorney J. Graham Sturgis Jr. Stood directly in front of George M. Rhodan at the first hearing in Family Court of Judge Nancy C. McLin in December, 2016. (6) As a direct and approximate result of a false mediation Scheduling, George M. Rhodan and Sandra Wilder Rhodan were intentionally kept apart during the entire mediation process. An eyewitness confirms confers on point. (7) Vera Simmons is not the daughter of George M. Rhodan as alleged of record. 18 U.S. Code 985 for forgery. Rule 60 (d) (3) to vacate a judgment for fraud on the Court.

1. The Plaintiff, Sandra Wilder - Rhodan, upon information and belief, disputes the Courts false allegations that, defendant George M. Rhodan moved to Beaufort because he was being treated badly by his wife. It is a well-known fact that both George and Sandra planned to restore their small home at 2 Red Oak, Lady's Island, S.C. It was clear that the spouse, Sandra Wilder Rhodan agreed that George M. Rhodan being retired, could take on the project at 2 Oak Drive, St. Helena Island , SC. Sandra Wilder Rhodan took on the additional responsibility of our family members while George was restoring the house at 2 Oak Drive, SC. George Would come home on weekends. George came home to get his truck as needed. We have never been separated for a year or met any of the factors for a divorce. I travel to 2 Oak Drive , Lady's,IsLand, SC. on many occasions. We had plans to restore our second property located at 5 Oak Drive as a bed and breakfast business. As a result of George's health and other related issues, we rejected starting the bed and breakfast project.

2. That upon information and belief, the Defendants are citizens and residents of Beaufort ,Dorchester and Charleston Counties of the State of South Carolina.

3. That the Plaintiff, Sandra-Wilder-Rhodan received a Summons stamped dated 12th December 2017 from an unknown Attorney J. Graham Sturgis, Jr. of 47 State Street, P.O. Box 236, Charleston, South Carolina 29402. It stated, Plaintiff was being given 30 days after service hereof, exclusive of the day of such service, and in the case that; (Plaintiff) fail to answer, we would be held in default do so, judgment by default will be rendered against you for relief demanded in the Complaint.

4. Within a short period of time thereafter, we were scheduled for a mediation.

Whereas, it was clearly apparent that both George and I, Sandra never were allowed to speak or converse. The alleged event took place with the mediators, Atty. Lester Schwartz and

Atty. Paul Schwartz located at 708 Sam Rittenberg Blvd, Charleston, South Carolina. 29407.

I acknowledged the attendance with and our granddaughter Roselyn Cobbs. The defendants, presents were, Attorney J. Graham Sturgis Jr. Vera Simmons, Nessa Jenkins. Defendants collectively carried out a wide-range of schemes in an effort that disallowed any communication or contact between Sandra W. Rhodan and George M. Rhodan.

During the mediation period, there was no grounds expressed for a divorce. Both Sandra – Wilder-Rhodan and George M. Rhodan demonstrated a positive working relationship. The parties lived together over 18 years. It is well-known that George M. Rhodan was an exceptional skilled worker in carpentry, plumbing and all around home repairman. Following Sandra-Wilder's Birthday, George purchased a new Buick and provided it to his spouse, Sandra W. Rhodan on her birthday in March 2016.

or that it was met or complied with in South Carolina. That at no time during the mediation process was it alleged or stated the basic ground for a divorce proceeding.

Attorney J. Sturgis Graham Jr.in December 2017 submitted was it that further perpetrate a bias

scheme of an alleged divorce.

We were defrauded of \$300.00 dollars each for a total of \$600.00 dollars. Our granddaughter, Roselyn Cobbs cried immensely while in the office of 708 Sam Rittenberg Blvd, with George Rhodan who likewise expressed his deepest emotional regards.

5. Vera Simmons and Attorney J. Sturgis Graham Jr., the defendants undertook significant efforts to conceal their roles in the divorce scheme . For Example, Vera Simmons conspired and added her name on the death certificate of George Rhodan as his representative. Whereas, Vera Simmons further claimed George Rhodan was her husband, Vera Simmons now claims, she is the daughter of George M. Rhodan is unfounded and disputed before the Court. Vera Simmons and J. Sturgis Graham Jr. incorporated the efforts of third parties' names and instructed other participants' to do the same in an effort to deprive money by a power of attorney document from the Wells Fargo Bank. This scheme of events was repeated on occasions of George Rohan Bank accounts, and IRA at wells Fargo.

6. It is apparently clear that both J. Sturgis Graham Jr. and Vera Simmons each named defendant was a part and an object of the conspiracy that was designed to willfully and knowingly, having devised and intending to devise a scheme and article to defraud, and for obtaining money and the scheme of undertaking a unlawful divorce action. Family Court taking of property by means of extortions, forgery pretenses, representations, and promises of real estate property at 2 Oaks, Lady's Island, South Carolina and 5 Oak Island St. Helen, South Carolina in violation of Title 18, United States Code, Sections 1343 and 2326, The allegations contained in paragraphs 1 though 6 above are Hereby repeated, alleged, and incorporated by reference as if fully set forth herein.

7. From at least December 2012 up to including at least in or about May 2023, in the State of South Carolina and elsewhere, J. Sturgis Graham Jr. and Vera Simmons, Aness Jenkins, Judge Nancy C. McLin; Atty. Veronica Smalls Sara Rhodan; Kimberly Rhodan; Shacoga Simmons; Dave Friedman; Keller Williams Realty; Wells Fargo Bank; Judge Cely Brigman; Judge Kenneth E. Fulp, Jr.; Judge William J. Wylie, Jr; Atty. Eduardo Curry; Rep. Micheal Rivers; State House #121. The Ruff & Ruff Attorneys at Law .

Defendants:

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

8. That on or about the aforementioned date, time and place, the Defendants proceeded In a false divorce conspiracy designed to knowing take property and involved in certain taking of cash and fund from the IRA account of both Sandra Wilder-Rhodan and George M. Rhodan. The representative attorney, allegedly hired by Vera Simmons is being paid by the Plaintiff. As a direct and proximate result of the actions of this court, Plaintiff, Sandra Wilder-Rhodan is unlawfully being denied the legal right as the personal representative. An unlawful Detrimental claim had and continues to result in an adverse taking and denial of rights against the Plaintiff. As direct and proximate result of Defendants refusal to correct the illegal personal representative document, the Plaintiff, has being harassed and retaliated against.

9. Where as a Direct and Approximate cause of collusion, unfair hearing, abuse of creditability and discrimination, found in your final order of the court, we demand the following:

10. The erroneous directive of the court was upheld regarding the rights of a spouse, "When a party to a divorce action dies after the hearing and the verbal decision of the Court, but before that decision can be reduced to writing, may the family Court proceed to issue its decree of divorce"? See Bayne v. Bass, 302 S.C. 208 (1990) court of Appeals South Carolina.

11. The final order of the Family Court and testimony conflicts erroneous testimony George Rhodan as husband of Vera Simmons. Document records show testimony of Listed Vera Simmons as personal representative of George M. Rhodan. Thirdly Vera Simmons claims she was the daughter of George M. Rhodan is in conflict with records. No proof or DNA records of the final order of the Court was substantiated. The final order allegation stating that the defendant is more creditable is flawed and ultimately without merit. The allegation of the Family Court represents to wit, an unlawful activity, fraud.

12. As a direct and proximate of your scheme and collusion, all funds taken from Wells Fargo Bank shall be refunded to the banks IRA of Both Sandra Wilder-Rhodan and George M. Rhodan.

13. As a direct and Proximate result all attorney fees shall be returned to the Plaintiff, Sandra Wilder Rhodan.

14. As a direct and proximate result of the unlawful taking of the marital home located at 303 Elliot Drive, Ladson, SC. It shall be returned to the spouse, Sandra Wilder- Rhodan with all Property both real and private items or cost thereof or replacement.

15. As a direct and proximate result of willfulness and wantonness of the defendants, Plaintiff suffered unlawful negligence and was denied due process rights. Plaintiff was denied full employment for 12 days as a direct result of the conspiracy toward a unlawful divorce claim and scheme of fraud.

16. As a direct and proximate result of a part and an object of the conspiracy that Attorney J. Graham Sturgis Jr., Vera Simmons and Family Court Judges, Nancy C. Mclin, Judge Cely Brigman, Judge William J. Wylie, Judge Kenneth E. Fulp in collusion misrepresented the unlawful allegations in a framed divorce conspiracy act. This act shall be referred to the S.C. Office of Disciplinary Counsel for sanctions, fines, a public reprimand and removal.

17. As it was further apart and object of the conspiracy that both Attorney J. Graham Sturgis Jr., Vera Simmons the defendants, and others knowing that the property involved in certain financial transactions would represent significant financial gain to wit, cash, transfers,

represented the proceeds of some form of unlawful activity. The money block placed upon the Wells Fargo Account and George M. Rhodan IRA account were designed in whole and in part to avoid a violation of Title 18, United States Code, Section 1956(a) (1) (B). (racketeering). Fargo Account of Sandra Wilder-Rhodan and George M. Rhodan near St. Helena island, SC. This act specified by J.Graham Sturgis Jr. and the transaction of Vera Simmons of an unlawful activity regarding of the forgery of a power of Attorney to take funds from the Wells Fargo Bank account of Sandra Wilder- Rhodan and George M. Rhodan.

18. As a direct and approximate cause of the defendants, did take changed his name on said property and sale the renovated Property of George M. Rhodan and Spouse. Knowing would and did engage and sale the property located a 2 Oaks St. Helena, SC. The property sold greater than \$30,000 dollars that was derived property than had been renovated by George M. Rhodan and Sandra Wilder-Rhodan by fraud and unlawful activity.

19. As a direct and proximate result of taking of our property we request forfeiture of all real or personal property used or intended to used to commit, to facilitate, or to promote the commission of said offense; and any and all real or personal property constituting, derived from, or traceable to the gross proceeds that the defendants obtain directly as a result of said offense including the sum of money and any and all proceeds traceable to the commission of the said offense of a fraudulent conspiracy.

20. Therefore if any of the aboved-described forfeitable property, as a direct result of this conspiracy and fraudulent divorce re act We further require the restoration of all property. We demand: The cardinal rule of statutory construction is to ascertain and effectuate the intent of the legislature."Hodges v. Rainey, 341 S.C. 79, 85, 533 S.E. 2d 578, 581 (2000).

YOU ARE HEREBY SUMMONED and required to answer the complaint in this action, A copy of which is herewith served upon you, and serve a copy of your Answer to the said Complaint on the subscriber at her office located: *Reference Rule 8 SCRPC.*

1. **Defendants:**

Judge Nancy C. McIn.

- A. Conspiracy : Attorney J. Graham Sturgis Jr. failed to disclose in a Divorce case that the female Vera Simmons was not married to the husband George Melvin Rhodan during the initial hearing. II. ***Fraud*** on the Court was perpetrated by Attorney J. Graham Sturgis Jr., when Vera Simmons was unlawfully listed on the Death certificate By counsel, J. Graham Sturgis Jr. III. A Rule 60 (d) (3) motion to vacate a judgment for fraud on the court is evidence thereof; IV. The scheme of offense alleged in count (1) and count (2) shall involve the widow's Legal Rights in South Carolina, intestate Succession states when a decedent dies without a will, the estate passes to its heirs..., If the decedent did not have children, the surviving spouse inherits the entire estate. As a direct and proximate result of your failure to provide the correct legal notice, see, Bayne v. Bass 302 S.C. 208 (1990).
- B. Fraudulent schemes: **Attorney J. Graham Sturgis Jr. Violated U.S. Constitution Title VII of the 1964 civil right act. Title 18, U.S. Code 242, failing to properly avoid discriminatory acts and disparity in treatment of caselaw.** II. As a direct result of your after his death of October 2, 2018 created a bias, unfavorable disposition toward the legal spouse. III. What motive were your allegations in appointing an illegal alien as the personal representative after she had held herself out as the wife of George M. Rhodan before the Court? IV. It was further a part of your objective collusion with Vera Simmons to forged a divorce. A retained citizen without a just cause, is illegal. Proceedings engage and attempt to engage in monetary transactions in criminally derived property in value over \$100,000 dollars of the Spouse, Sandra Wilder Rhodan. In violation of Title 18, United States Code 242, and Denial of Due Process. A. cardinal rule violated, to a black couple as opposed to a white couples who are subjected to the same State laws is racist. Whites in the case of Bayne v. Bass, Case v. Case and Louthian and Merritt, P.A. V. Davis, 272 S.C. What are the requirements of Rule 26 of South Carolina

Rules of Family Court, when each event and circumstances are the same excluding color?.

C. Attorney Veronica G. Smalls: In the Family Court, First Judicial Circuit Case NO. 2014-DR-18-1742 Plaintiff, Sandra Wilder Rhodan file an action December 1, 2014. The Husband, George Melvin Rhodan, by Attorney Paul W. Bradley, appeared by affidavit: The parties reached an agreement as evidence by their signatures:

(1) The parties agree that they have a common law marriage as defined by the South Carolina Code of Laws.

(2) MARITAL HOME: The Defendant/Husband shall payoff the mortgage on the

Marital home And thereafter Quit Claim his interest in the marital home to

Plaintiff/Wife.

(3) 401(k): The parties agree that the Defendant/Husband shall keep Plaintiff/Wife as a beneficiary on his 401(k) but must have 25% allocated to Plaintiff/Wife in any circumstance.

(4) EQUITABLE DISTRIBUTION: The parties agree that this order is not and should not Be considered an equitable distribution of marital assets. If the parties divorce in the future, the marital home and 401(k) shall be brought into that action for equitable distribution.

(5) ATTORNEY' FEES: Defendant/ Husband shall be responsible for his own attorney's fees, in addition to paying \$3, 500.00 towards Plaintiff/Wife's attorney's fees.

CONCLUSION OF LAW

AS a direct result of the Plaintiff/Wife having met her burden of payment of \$3,500.00 Plaintiff states that she paid for both parties. That as a direct result of the Attorney's recusal to Further represent her in the matter of Rhodan v. Rhodan she request the refund of the second payment of the \$3,500.00 dollars.

D. Vera Simmons: Defendant:

As a direct result of your schemes in collusion with Attorney. J. Graham Sturgis Jr.

Show cause and proof of your DNA as it relates to George M. Rhodan. Show proof and

cause of your ownership to be lawfully placed on the Death Certificate of George M.

Rhodan. Demonstrate the authority that gave you the right to present a power of

attorney to wells Fargo Bank account and George M. Rhodan's IRA. What authority did

you have of any Court to sign my name on an unlawful check? What authority did you

have to stop George M. Rhodan heart medical prescriptions of his medical doctor. What

fldlf

authority or part were you given to sale the estate at 2 Oaks Drive Ladys Island, SC?

E. Kenneth E. Fulp Jr. 843-255-5853

102 Ribaut Rd

Beaufort, SC 29402

Plaintiff, Comes now and states the Court operation refuse to correct the personal representative document and the death certificate of George M. Rhodan. That no record Demonstrated Vera Simmons was George M. Rhodan Sr. daughter as alleged in the record see case 2018-ES-07-01093 unlawful certificate of appointment and fraud upon the Court. A Rule 60 (B) motion to vacate a judgment for fraud on the court in the United States District Court is required as such her attorney encouragement. **Due Process** under the 14th Amendment U.S. Constitution is available is a fair tool.

F. Anessa Jenkins Ph. 864-760-2006

Greenville, SC 29907

State your reason for intervening in the conspiracy of Sandra Wilder Rhodan and George M. Rhodan? Are you one of the original daughters of George M. Rhodan ? What manner and authority did you assess George M. Rhodan's IRA and bank data? What was the realty company you advertised the property at 303 Elliot Drive, Ladson, SC? Were you aware of the fact, George never filed for a divorce ACTION? Who contacted you. Why was George M. Rhodan medical prescription terminated by Vera Simmons?

G. Sara Rhodan Ph: 843-926-6634

St. Helena Island, SC. 29906

State your relationship to George M. Rhodan. When were you at 2 Red Oak Drive? Did you witness George being sick and when? Did George provide assistance to you. Were you aware of the sale of the house at 2 Red Oak Drive? How much property did George own and who changed his name from the property. When did Shacoga Simmons move into the @ Red Oak House? Why? What relations are Vera Simmons and Shacoga Simmons, sisters, cousins or other.

- H. Kimberly Rhodan Ph: 843-592-5153
25 Eagle Ridge Road Road#40
Beaufort, SC 29906

State your relationship with George M. Rhodan. What was the reason the property at 2 Red Oak Drive was Sold. What company sold the property. Who purchased the Property and house. What is your relationship to Vera Simmons, sister, aunt, cousin Niece. How long have you known her? Vera Simmons states she is the daughter of George M. Rhodan, your sister. To the best of your knowledge is that correct? Please answer to the best of your knowledge.

- I. Shacoga Simmons. Ph: 843-575-0593
#40 Rue Dubois, Beaufort, SC 29907

Please answer the questions to the best of your ability and knowledge:
What is the relationship between you and Vera Simmons. When did you Find out George M. Rhodan was deceased? How did know and where?
What was the police called for by George M. Rhodan at 2 Red Oak Lady's Island, SC? Who sold the property at 2 Red Oak Drive, SC. Were you aware Of George being sick? Was George M. Rhodan living at 2 Red Oak Drive prior To it being sold. Explain from your knowledge, who sold the property at 2 Red Oak Drive.

- J. Dave Friedman and Keller Williams Realty Ph:
496 Bramson Ct. Mount Pleasant, SC 29464.

Please provide the information to the best of your knowledge and Ability. Who contacted you for the listing and sale of property at 303 Elliott Drive, Ladson, SC 29456. Were you aware of this property Was contested in an unlawful divorce scheme? What are the closing

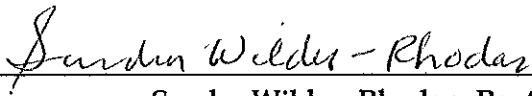
Parties to this transaction? Please answer fully to all question. Were you Made aware of the allegations of fraud?

- I. Attorney Eduardo Curry Ph: 843-767-5284
6518-D Dorchester Road
North Charleston, SC 29418

In the matter of Sandra Wilder- Rhodan, client alleges you failed to
Provide effective assistant of counsel when you failed to advise her of the
requirement of proper service under SCRCF Rule 4 and providing proof of service to
the court at the Beaufort County Probate Court No. # 2018ES0701003. That the \$25.00

Second filing fee was not a requirement. This a request for the return of the additional fee paid you.
Should you not return the cost fee. It shall be reported

To the disciplinary committee under legal Profession Act, 1971 Act 15. The motion
for a Emergency Hearing requesting a stay and injunction delaying the sale of the
marital estate of Sandra Wilder-Rhodan /estate beneficiary of George M. Rhodan.

By 
Sandra Wilder- Rhodan, Pro Se
2227 James Bell Blvd
North Charleston, South Carolina 29406

Motion for Appointment of Counsel

Attachment:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

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Sandra Wilder-Rhodan/of	}	
Estate and George M. Rhodan	}	<u>CA No. 2:23-00771 BHH-MHC</u>
	}	
Vs.	}	_____
State of South Carolina, Family Court,	}	
Judge; Nancy C. McLin; Attorney J. Graham	}	
Sturgis Jr. Attorney Veronica G. Smalls;	}	
Vera Simmons, Personal Representative;	}	
Aness Jenkins; Sara Rhodan; Kimberly	}	
Rhodan; Shacoga Simmons; Dave Friedman/	}	
Keller Williams Realty; Wells Fargo Bank;	}	
Judge Jude Cely Brigman; Judge Kenneth F.	}	
Fulp Jr; Judge William J. Wylie, Jr.; Attorney	}	
Eduardo Curry, Rep. Micheal F. Rivers; House	}	
Seat #121.SC. Ruff & Ruff, Law firm;	}	
Defendants.	}	
_____	}	

MOTION FOR APPOINTMENT OF COUNSEL

Comes now, Sandra Wilder-Rhodan, Plaintiff in the above and entitled matter, and respectfully requests appointment of counsel as provided by the Court. Plaintiff in Support thereof, will show the following:

1. That Plaintiff has made a diligent effort to employ counsel.

Contacted Private Attorneys.

2. Contacted SC Law School
3. Contacted local lawyer referral service

II. I am employed and owner of a Transportation Service at the North Charleston Airport. I have employed for the last 5 years. I am a mother, with (3) siblings in household.

III. I declare or certify under penalty of perjury that the foregoing is true and correct.

Date

Sandra Wilder-Rhodan

Signature of Plaintiff 5-22-23

2227 James Bell Blvd

North Charleston, South Carolina

Ph: 843-330-8763 29406

E-mail: Sandra. Wilder60@Gmail.com